

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

CYNTHIA MENJIVAR, )  
Plaintiff, )  
v. ) Case No. 1:21-cv-00453 (TSE)  
AETNA LIFE INSURANCE COMPANY )  
Defendant. )

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Defendant Aetna Life Insurance Company (“Aetna”), by counsel, and pursuant to Fed. R. Civ. P. 56 and L.R. Civ. P. 56, moves this Court for summary judgment on all counts against it in the Complaint and requests that it be awarded its fees and costs.

The grounds for granting Aetna's motion are more fully set forth in the accompanying memorandum.

Respectfully submitted,

## AETNA LIFE INSURANCE COMPANY

By: /s/ *Laura D. Windsor*  
Laura D. Windsor  
Virginia State Bar No. 70354  
Counsel for Defendant  
WILLIAMS MULLEN  
200 South 10<sup>th</sup> Street, Suite 16  
Richmond, Virginia 23219  
Telephone: (804) 420-6466  
Facsimile: (804) 420-6507  
[lwindsor@williamsmullen.com](mailto:lwindsor@williamsmullen.com)

Matthew T. Anderson  
Virginia State Bar No. 86322  
Counsel for Defendant  
WILLIAMS MULLEN  
200 South 10<sup>th</sup> Street, Suite 1600  
Richmond, Virginia 23219  
Telephone: (804) 420-6289  
Facsimile: (804) 420-6507  
manderson@williamsmullen.com

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of January 2022, I electronically filed the foregoing Motion for Summary Judgment with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Benjamin W. Glass, III  
Benjamin W. Glass, III & Associates, P.C.  
3998 Fair Ridge Dr., Suite 250  
Fairfax, VA 22033

By: /s/ *Laura D. Windsor*  
Laura D. Windsor  
Virginia State Bar No. 70354  
Counsel for Defendant  
WILLIAMS MULLEN  
200 South 10<sup>th</sup> Street, Suite 1600  
Richmond, Virginia 23219  
Telephone: (804) 420-6466  
Facsimile: (804) 420-6507  
lwindsor@williamsmullen.com